

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TYRONE J. LLOYD,)	
)	
Plaintiff,)	Case no. 08CV3059 PH
)	
v.)	Judge Guzman
)	Magistrate Judge Cox
FORD MOTOR COMPANY,)	
)	
Defendant.)	

**MOTION FOR EXTENSION OF TIME TO ANSWER OF OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

Defendant Ford Motor Company hereby moves for an order extending its time to answer or otherwise respond to Plaintiff's Complaint to and including July 31, 2008. In support of this motion Ford states as follows:

1. Ford was served with Plaintiff's Complaint on June 24, 2008, making its responsive pleading due on or before July 14, 2008.
2. Plaintiff's Complaint contains 96 fact paragraphs and covers events dating back nearly 10 years. Ford has only recently retained counsel to defend this matter and counsel needs additional time to compile information and prepare a response to the Complaint.
3. In addition, Ford's Chicago Assembly Plant, where the events underlying Plaintiff's Complaint allegedly took place has been closed for an extended period of time over the July 4th holiday, delaying Ford's investigation into the Complaint allegations.
4. Counsel for Ford attempted to contact Plaintiff's counsel by phone on several occasions to obtain his consent to this motion but was unable to reach him. Counsel left a message requesting a return call but did not receive one prior to filing this motion.

5. Ford does not make this request for purposes of delay, but rather in the interest of justice and so that it may prepare an appropriate response to Plaintiff's Complaint.

WHEREFORE, Defendant Ford Motor Company respectfully requests that the Court enter an order extending its time to answer or otherwise respond to Plaintiff's Complaint to and including July 31, 2008 and for whatever other and further relief the court deems just and proper.

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2008, the foregoing was filed electronically with the Clerk of the court to be served by operation of the court's electronic filing system upon the following:

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s/ Kurt D. Williams
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